

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

KARLA K. ALLSBERRY and
LORI RUSSELL

Plaintiffs,

vs.

JUDGE PATRICK S. FLYNN, In his
Individual Capacity,
KATHY HALL, In her Individual
Capacity,
DIANNE DOLL, In her Individual
Capacity,
SHERIFF JOHN COTTLE, In his
Individual Capacity,
DEPUTY SHERIFF RYAN PARKER,
In his Individual Capacity,
DEPUTY SHERIFF/BAILIFF JULIE
CONNOR, In her Individual Capacity)
and DEPUTY SHERIFF/BAILIFF
ANTONIO PINEIRO, In his Individual
Capacity

Defendants.

Case No. 4:19-cv-02366

**PLAINTIFFS DEMAND TRIAL BY
A JURY ON ALL COUNTS**

**MOTION TO LIFT THE STAY FOR THE LIMITED PURPOSE
OF PERMITTING THE ISSUANCE AND SERVICE OF SUMMONS
ON NEWLY ADDED DEFENDANT DIANNE DOLL**

COME NOW Plaintiffs, Karla Allsberry and Lori Russell, and move the Court to lift the stay for the limited purpose of permitting the issuance of Summons and service of Summons on the newly added Defendant, Dianne Doll, and for the purpose of permitting the Attorney General's Office to enter an appearance on behalf of Dianne Doll, if they choose to waive service, as follows:

1. The Court previously granted the Motion to File the Second Amended Complaint and to add Dianne Doll as a party Defendant, then stayed the case for about six months, until September 2020.

2. Plaintiffs move the Court to lift the stay for the limited purpose of permitting them to obtain issuance of Summons and service of Summons on Dianne Doll, with the understanding that no further action will be taken against Dianne Doll so long as the stay remains in place.

3. Plaintiffs also move the Court to lift the stay to permit the Attorney General's Office to enter an appearance on behalf of Dianne Doll, should they choose to waive service of Summons.

4. A proposed Order is attached.

WHEREFORE, Plaintiffs, Karla Allsberry and Lori Russell, move the court to lift the stay to permit the issuance and service of Summons on Dianne Doll, and alternatively to allow the Attorney General to enter an appearance on behalf of Dianne Doll, if it chooses to waive service of Summons.

/s/ David M. Duree

David M. Duree, MBE 21003
David M. Duree & Associates, P.C.
312 South Lincoln Avenue
P.O. Box 1416
O'Fallon, IL 62269
Tel: 618-628-0186
Fax: 618-628-0259
Email: law@dmduree.net

*Attorney for Plaintiffs, Karla K. Allsberry
And Lori Russell*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the Clerk this 9th day of March 2020 and that the Clerk's office electronically served a copy on the following:

john.taylor@ago.mo.gov

Mr. John Taylor
Missouri Attorney General's Office
P.O. Box 861
St. Louis, MO 63188
*Attorney for Judge Patrick S. Flynn,
Kathy Hall and Dianne Doll*

khenson@pcblawfirm.com

Mr. D. Keith Henson
Paule, Camazine & Blumenthal, PC
165 North Meramec Avenue, Suite 110
St. Louis (Clayton), MO 63105-3772
Attorney for Defendants Cottle, Parker, Connor and Pineiro

/s/ David M. Duree

David M. Duree, MBE 21003
David M. Duree & Associates, P.C.